

FILED WITH THE BOARD OF
PSYCHOLOGICAL EXAMINERS
ON 12-3-97

STATE OF NEW JERSEY
DEPARTMENT OF LAW & PUBLIC SAFETY
DIVISION OF CONSUMER AFFAIRS
BOARD OF PSYCHOLOGICAL EXAMINERS
DOCKET NO. BDS 2981-95

In the Matter of the Suspension)	Administrative Action
or Revocation of the License of)	
)	FINAL DECISION AND ORDER
LAWRENCE D. SPIEGEL, Ed.D.)	
)	
Licensed to Practice Psychology)	
in the State of New Jersey)	
)	

This matter was brought before the New Jersey State Board of Psychological Examiners ("Board") on February 7, 1994, on the verified complaint of Deborah T. Poritz, then Attorney General of New Jersey, by Joan D. Gelber, Deputy Attorney General, together with an application for a temporary suspension of the license of Lawrence D. Spiegel, Ed.D. ("respondent") to practice psychology in the State of New Jersey. The verified complaint contained six counts. Count I alleged that respondent engaged in numerous acts of gross and repeated negligence, malpractice and/or incompetence; professional misconduct; and a failure to maintain the ongoing requirement of good moral character, as well as violations of Board regulations concerning professional conduct in connection with psychological services rendered to male minor L.B. and female minor S.B. Count II alleged that respondent has been a habitual and/or intemperate user of alcoholic intoxicants, narcotics and stimulants, such conduct constituting violations of Board regulations concerning professional practice as well as professional misconduct and a failure of good moral character. Count III alleged misconduct in connection with respondent's

involvement with handguns and other weapons. Count IV alleged criminal convictions involving the unlawful possession of controlled dangerous substances and the unlawful possession of a handgun. Count V alleged a failure to comply with accepted standards of practice for a psychologist in the provision of an expert report to client David Stetson. Count VI alleged a failure to notify the Board of a change of address as required by regulation. Subsequent to the transfer of the case to the Office of Administrative Law (OAL), a Count VII was added to the complaint alleging the unlicensed practice of professional psychology, misrepresentation, deception, false pretense, and failure of the ongoing requirement of good moral character in connection with the provision of psychological services to a client in the State of Vermont.

PROCEDURAL HISTORY SUMMARY

The Board conducted a hearing on the Attorney General's application for a temporary suspension of licensure on February 28, 1994. On the basis of the evidence presented, the Board concluded that Dr. Spiegel's conduct with the children as alleged in Count I of the verified complaint palpably demonstrated a clear and imminent danger to the health and safety of the public and entered an order for the temporary suspension of respondent's license pending a plenary hearing on the administrative complaint. A written order memorializing the Board's findings and conclusions was entered on March 7, 1994, and the matter was transferred to the OAL as a contested case.

Respondent's application to the Board for a stay of the temporary suspension order pending appeal was denied on March 21, 1994. The Superior Court, Appellate Division, subsequently denied respondent's application for leave to appeal on June 20, 1994.

Hearings on the administrative complaint were scheduled at the OAL commencing on November 14, 1994. These hearing dates were adjourned at the request of the respondent to January 10, 1995. On or about January 9, 1995, respondent advised the Administrative Law Judge (ALJ) that he wished to surrender his license to practice psychology, and he intended to terminate the then pending matter. The Attorney General moved before the Board in February 1995 for an order finding respondent in default and imposing disciplinary sanctions including the revocation of respondent's license. Respondent replied by filing a cross-motion for a Board order accepting his resignation without findings and without the imposition of disciplinary action. In an Order entered on March 8, 1995, the Board declined to entertain the motion for default, denied respondent's request for an order accepting his resignation of licensure, and remanded the matter to the OAL for further hearings as a contested case.

In May 1995, prior to the commencement of hearings at the OAL, respondent moved before the Board for reconsideration of its temporary suspension order. The Board's decision and order denying Dr. Spiegel's motion was entered on June 6, 1995.

Hearings on the verified complaint commenced at the OAL before ALJ Diana C. Sukovich in November 1995. Hearings continued

into December 1995, and post-hearing submissions continued until May 1996. The Attorney General's motion to add Count VII to the complaint also was made in May 1996 and granted by the Administrative Law Judge on August 23, 1996.

The Attorney General's motion for summary judgment on the allegations in Count VII was granted in part and denied in part by ALJ Sukovich in an Order Granting Partial Summary Decision (Summary Decision) on December 16, 1996, which is incorporated herein by reference as if fully set forth. Thereafter, the record was closed on February 20, 1997.

Judge Sukovich's Initial Decision was issued on September 15, 1997 and is incorporated herein by reference, as if fully set forth, except as specifically modified by this Order. Exceptions to that Initial Decision were filed with the Board by the respondent and the Attorney General. On November 17, 1997, Dr. Spiegel, appearing pro se, and DAG Gelber appeared before the Board for oral argument on the Exceptions to the Initial Decision. Dr. Jeffrey Tindall recused himself from participation in the case.

Respondent's request for additional time beyond the 15 minutes for oral argument on the Exceptions and 30 minutes for mitigation in the penalty phase of the hearing, as provided by written notice in advance of the hearing, was denied by the Board in view of the adequate opportunity provided to both parties to file written Exceptions to the Initial Decision for the Board's consideration.

The Exceptions submitted by the Attorney General noted that although the ALJ's Summary Decision on Count VII did not recommend a penalty pending issuance of her Initial Decision on the entire case, a penalty for Count VII was not addressed or included in the Initial Decision. The Board has imposed a civil penalty in this Order in the amount of \$2,500.00 on Count VII.

The Attorney General also asked for full restitution to David Stetson (Count V) in the amount of \$5,000.00 notwithstanding the ALJ's recommendation (Initial Decision at 44) that respondent was entitled to some compensation for the services he performed for Mr. Stetson. The Board agrees with the ALJ's reasons and accepts the recommendation that restitution be ordered in the amount of \$2,500.00.

There also appeared to be some ambiguity, according to the Attorney General, in regard to the timing recommended for the payment of penalties, costs, and restitution. This Order clarifies when such payments must be made and confirms that these obligations are independent of any conditions for reinstatement.

Both parties noted in their Exceptions an apparent contradiction in the ALJ's findings concerning Count II. Although the ALJ found (Initial Decision at 39) that respondent's conduct was unlawful in regard to narcotics and controlled dangerous substances, she was not persuaded that Dr. Spiegel was an intemperate user of alcohol. However, the ALJ's conclusions (Initial Decision at 46) included the intemperate use of all three substances. The Board is convinced that the reference to alcohol

on page 46 of the Initial Decision was inadvertent because the ALJ was clear on page 39 that respondent's conduct concerning alcohol was not violative of the law.

Dr. Spiegel's Exceptions reiterated his contention that he has been denied due process in these proceedings and that his civil rights have been violated. He advised the Board of his currently pending complaint in federal court concerning these issues.

Respondent's Exceptions also contend that, with certain limited exceptions which he acknowledges, the Initial Decision is replete with false facts which permeate the entire decision. For example, respondent asserts that the ALJ's findings concerning improper conduct in the circumstances when he took the two adolescent children to his motor home for a weekend are untrue because he used these weekends as a mechanism for crisis intervention. He also rejects the conclusion made by the ALJ in the Initial Decision that showing the adolescent L.B. a gun was not of therapeutic value, stating that it was in fact very therapeutic in order to quell his appetite for guns. Dr. Spiegel perceives most of the findings to be distorted in this way. He states that he is being punished for refusing to admit to things he did not do. Respondent also asserts that the Attorney General is attempting to interfere with his First Amendment rights because he is planning to write a book about this experience. The Board has reviewed the entire record in regard to Dr. Spiegel's Exceptions.

In view of their wide range, the Board's conclusions will be addressed throughout this Decision.

Dr. Spiegel also attached several documents to his Exceptions, some of which were not a part of the formal record from the OAL. The Board has declined to accept those documents as evidential since they were available and could have been introduced at the time of the hearings.

Respondent also requested from the Board an opportunity to cross-examine DAG Joan Gelber since she is his essential accuser. He contends that it is only by such testimony that he can demonstrate to the Board that DAG Gelber has deceived the Board throughout these proceedings with lies and coerced witnesses. Dr. Spiegel also moved previously at the OAL for disqualification of DAG Gelber on essentially many of the same grounds. The Board denied respondent's request to cross-examine DAG Gelber because the Board is satisfied that DAG Gelber was acting in these proceedings within her role as a prosecutor on behalf of the Attorney General and that she is not a necessary witness to the facts in this case. The Board also relied in this regard on the Order entered by the ALJ on November 3, 1994, denying respondent's motion to disqualify DAG Gelber.

After argument, the Board moved into closed session in order to deliberate on the matter and thereafter announced its findings of fact and conclusions of law in public session on November 17, 1997, noting that its reasons would be more fully set forth in a written order. The Board then continued the proceedings

with the mitigation aspect of the hearing. The Board noted its acceptance of Dr. Spiegel's character certifications from Pauline Spiegel, respondent's first wife, and Eleanor Sinnett, a former patient. Ms. Spiegel attested to Dr. Spiegel's character and his dedication as a professional. Ms. Sinnett praised respondent as a treating psychologist. Dr. Spiegel and DAG Gelber presented argument to the Board concerning the imposition of penalty. There were no other witnesses.

Dr. Spiegel urged the Board to return his license to practice psychology. He asserted that the Attorney General's complaint overcharged in its allegations and that no harm occurred in connection with these events. He further advised the Board that there was never any intent on his part to do wrong, and that he has learned through this experience that even an appearance of impropriety can create problems for a professional. Dr. Spiegel told the Board that psychology is the only profession he knows, that he has tried other work without success during this time of license suspension, and that he wants to return to psychology and his patients.

DAG Gelber urged revocation of respondent's license on behalf of the Attorney General. She stated that the respondent is in need of remediation and rehabilitation in that he does not appreciate the gravity of his conduct.

After due consideration of the Administrative Law Judge's Initial Decision, hearing transcripts, documentary evidence, exceptions, oral argument, character certifications and other

mitigating circumstances for a determination of penalty, the Board of Psychological Examiners makes the following findings of fact and conclusions of law.

FINDINGS OF FACT

The Board adopts all of the findings of fact set forth in Judge Sukovich's Initial Decision at pages 7 to 35 and Summary Decision at pages 3 to 12, including her findings with respect to the credibility of the witnesses as if they were fully set forth herein. Amendments to the Initial Decision and Summary Decision involving typographical and minor clerical corrections are incorporated as an Appendix to this Final Decision. Some of these corrections were noted by ALJ Sukovich and DAG Gelber subsequent to the issuance of the Initial Decision, and some were noted by Board members during their review of the entire record in this matter. None of the corrections were material to the substantive findings of fact adopted herein.

CONCLUSIONS OF LAW

The Board adopts all of the conclusions of law set forth in Judge Sukovich's Initial Decision at pages 35 to 47 and Summary Decision at pages 12 to 20 as if they were fully set forth herein. Specifically, the Board concludes that the conduct of the respondent constituted the following:

Count I of the Verified Complaint sets forth the facts and circumstances in regard to professional psychological services rendered by the respondent to the B. family including male L.B. (age 16), female S.B. (age 14), and Mrs. B., the children's mother.

Counseling commenced in March 1993. Early in April 1993 Dr. Spiegel offered to take the children "camping" with him for two weekends. In fact, the children were taken to respondent's motor home in Parsippany where they slept in an adjoining mini-camper. Some of the significant incidents which occurred during these weekends are set forth in the Discussion that follows herein. The Board adopts the conclusion of the ALJ that respondent's conduct pertinent to L.B. and S.B. in connection with the so-called "camping weekends" constitutes gross deviations from the acceptable standard for the professional practice of psychology. Further, in view of the number of different incidents which fall into this category over a period of two weekends, the Board also concludes that respondent's conduct constitutes repeated acts of negligence as well as professional misconduct, all in violation of N.J.S.A. 45:1-21(c), (d), and (e).

The second count of the Complaint concerns respondent's use of narcotics and controlled dangerous substances. Dr. Spiegel has acknowledged from the outset of these proceedings that during the period of approximately 1990 to 1992 he used cocaine. The evidence demonstrates that during a period overlapping with the cocaine usage and lasting at least until September 1993, respondent filled a huge number of prescriptions for controlled dangerous substances without medical or dental justification. Therefore, respondent's use of narcotics and controlled dangerous substances was intemperate in violation of N.J.S.A. 45:14B-24(d). More important, however, is respondent's conduct in connection with the

use of these substances. An overwhelming number of the prescriptions for controlled dangerous substances were written on the prescribing script of Stanley Frumkin, D.D.S. Dr. Frumkin admitted that he signed blank prescription forms and permitted Dr. Spiegel to write in the drug, the quantity, and the directions. Further, respondent filled more than one prescription for the same medication on the same date, at different pharmacies, and engaged in a pattern of conduct evidencing knowledge on his part that his usage of these controlled dangerous substances was not medically or dentally justified. Although there is no direct evidence that respondent utilized narcotics or controlled dangerous substances at the same time as he was treating a patient, the fact that he was continuously engaged in the private practice of psychology during the same period of time when he was regularly using cocaine and also filling large numbers of narcotic prescriptions, demonstrates a disregard for the needs of his patients and a clear exercise of poor judgment during this time period. The Board concludes that Dr. Spiegel's conduct during the period of time when he was using cocaine and controlled dangerous substances constitutes professional misconduct in violation of N.J.S.A. 45:1-21(e). The Board also agrees with the ALJ's conclusion that the evidence does not support any violation in connection with the consumption of alcoholic beverages. Further, the Board adopts the ALJ's reasons for rejecting respondent's claim that the Attorney General was precluded from instituting action against him because of the

Americans with Disabilities Act (Initial Decision at 41-42 and the ALJ's prior rulings).

The Board agrees with the conclusions of the ALJ that respondent's possession and display of handguns, whether operable or not, constitute professional misconduct. The Board also concludes that Dr. Spiegel's conduct when he showed a gun to L.B. during one of the "camping" weekends also constitutes professional misconduct in violation of N.J.S.A. 45:1-21(e).

Count IV of the Verified Complaint concerns respondent's criminal convictions for unlawful possession of controlled dangerous substances and a handgun. The Board concludes that these are convictions for crimes involving moral turpitude and/or relating adversely to the profession in violation of N.J.S.A. 45:1-21(f).

The Board further concludes that respondent's conduct as set forth in Count V pertaining to his failure to provide professional services, including an expert report, to David Stetson within acceptable standards for the practice of psychology constitutes professional misconduct in violation of N.J.S.A. 45:1-21(e) and evidences a lack of good moral character, as concluded by the ALJ and as a continuing requirement for licensure pursuant to N.J.S.A. 45:14B-14(b).

Count VI establishes respondent's failure to notify the Board of a change of address in accordance with Board regulations. The Board concludes that respondent's conduct in this regard constitutes a violation of N.J.S.A. 45:1-21(h).

The Board also agrees with the ALJ's conclusions in connection with Count VII of the complaint which was resolved by way of summary decision. Respondent's engagement in the unlicensed practice of psychology by providing professional services to a client in the State of Vermont subsequent to the suspension of his license in this State constitutes professional misconduct in violation of N.J.S.A. 45:1-21(e).

DISCUSSION

Upon review of the entire record in this matter, the Board finds itself in substantial agreement with ALJ Sukovich that the violations in Count I of the complaint concerning the events surrounding respondent's conduct with his adolescent patients, male minor L.B. and female minor S.B., during two separate weekends in April 1993 are extremely serious and are the most egregious of the allegations in the complaint. The facts and circumstances pertaining to Count I, standing alone, justify a revocation of respondent's license to practice psychology. Dr. Spiegel's conduct demonstrated extremely gross and repeated deviations from acceptable standards of care. The Board is obliged to protect the public through the serious sanction of revocation because there is no evidence that Dr. Spiegel may now be trusted to recognize the blurring of boundaries between professional and patient as occurred in this case. To date respondent fails to acknowledge any question about the wisdom of his conduct concerning these young patients.

There is no question that Dr. Spiegel offered on these weekends to take the children away alone with him for the weekend

without their mother. He took the children to his motor home where he resides alone, and the children slept in an adjoining mini-camper. It also is clear from the record that during the course of these weekends the following occurred:

1. Dr. Spiegel used profane language, sometimes referred to S.B. as a "bitch", and generally used degrading language about women.
2. Dr. Spiegel talked to the children in an especially degrading manner in regard to the genitalia of oriental women.
3. Dr. Spiegel tried to tickle S.B. and, on at least one occasion, Dr. Spiegel and L.B. tickled S.B.
4. Dr. Spiegel either invited or permitted S.B. to sit on his lap or between his legs with a pillow while they were watching T.V.
5. Dr. Spiegel showed a gun or guns, operable or inoperable, to L.B. and discussed the use of the guns.
6. Dr. Spiegel gave the children alcoholic beverages to drink.
7. Dr. Spiegel took the children to a pool hall, and while there, he had S.B. ask a woman to come and play with them. He later tried to telephone the woman, telling S.B. he was trying to arrange a date.

These facts establish a pattern of improper involvement between a therapist and minor patients, which resulted in a risk of actual harm to the children. These were children who presented themselves to Dr. Spiegel as patients with significant emotional and family problems. The Board supports the ALJ's conclusion that there was no therapeutic justification for these weekend "camping" trips and still less for any of the conduct that occurred during these weekends. The Board is persuaded that they were flagrantly

unprofessional and grossly deviant of any accepted standards for psychologists.

The Board also finds egregious respondent's conduct in connection with the admitted use of narcotics and controlled dangerous substances and his intermittent involvement with guns. This conduct also is directly related to his prior criminal convictions. Further, Dr. Spiegel's engagement in the unlicensed practice of psychology subsequent to his temporary suspension demonstrates a complete disregard for professional ethics. These events in their totality demonstrate a course of conduct that clearly deviates from acceptable standards for the practice of psychology and constitutes a blatant disregard of professional boundaries. These circumstances warrant additional sanctions beyond the revocation justified by Count I alone.

Dr. Spiegel continues to maintain that he is the victim of persecution in these matters, that the Attorney General has overcharged in her complaint, and that, if anything, respondent's only shortcoming was a failure to recognize that even an appearance of impropriety could get him into trouble. Respondent appears to be incapable of recognizing the fact that a license to practice psychology places him in a position of trust. Patients, such as the children in this matter, are referred to a psychologist when they are most vulnerable. They enter therapy with the confidence that they are placing their psychological welfare in a professional's charge. In many cases, and certainly in regard to the children in this case, a patient begins therapy with a

psychologist at a time in their lives when they are in need of someone in whom they can place absolute trust as a licensed professional. By his conduct, Dr. Spiegel has utterly and totally violated this position of trust.

The Board is struck by the fact that Dr. Spiegel to the present day fails to recognize or acknowledge any deviations in acceptable standard of care in his conduct. He projects blame on every party except himself. However, it is clear to this Board that respondent's conduct is egregious in every respect and cannot be permitted to continue.

Accordingly, respondent's continuing failure to acknowledge any wrongdoing and his continual efforts to persuade the Board that he is the victim in these proceedings, merely serve to convince the Board that it cannot assure the public of the trustworthiness of its licensees and at the same time permit Dr. Spiegel to practice in the profession. The Board has thoroughly reviewed the entire record in this matter, and considering the totality of the evidence before it, the Board must conclude that the Attorney General has demonstrated an unacceptable and unlawful course of conduct over an extended period of time. Further, it is appropriate for this Board to discipline a licensee for conduct, such as Dr. Spiegel's, which clearly undermines the public's confidence in the integrity and trustworthiness of the profession. Consequently, and for the foregoing reasons,

IT IS ON THIS 10th DAY OF DECEMBER, 1997,

ORDERED THAT:

1. The license of Lawrence D. Spiegel, Ed.D., to practice psychology in the State of New Jersey is hereby revoked effective upon service of the within Order by certified and regular mail. During the period of time in which respondent's license remains revoked, he shall not own or otherwise maintain a pecuniary or beneficial interest in a psychological practice or function as a manager or operator of a place where psychological services are performed or otherwise practice psychology as defined in N.J.S.A. 45:14B-1 et seq. Further, respondent shall desist and refrain from furnishing professional psychological services, giving an opinion as to the practice of psychology or its application or any advice with relation thereto; from holding himself out to the public as being entitled to practice psychology or in any way assuming to be a practicing professional such as a counselor, psychotherapist, psychoanalyst, therapist or other mental health care worker; or from advertising or writing in such a manner as to convey to the public the impression that he is a legal practitioner or authorized to practice psychology. This prohibition includes refraining during the period of revocation from placement of any advertisement or professional listing in any advertising medium suggesting eligibility for practice or good standing. This prohibition further shall include the preparation of any report or appearance before any court or tribunal as an expert witness unless the case involves a matter handled prior to being disciplined and unless the status of the respondent is disclosed in writing to the person requesting such report or appearance.

2. In the event application is made to the Board for reinstatement as authorized by N.J.S.A. 45:14B-25 after the expiration of one year from the date of revocation of licensure, Dr. Spiegel shall be required to satisfy the Board that he is competent to engage in the practice of psychology. Prior to entertaining any petition for reinstatement, the Board will require Dr. Spiegel to submit to a comprehensive psychological evaluation, a comprehensive medical evaluation, and a comprehensive substance abuse evaluation, all with Board appointed evaluators. Dr. Spiegel shall be responsible for the costs of such evaluations and any written reports which are submitted to the Board. In the event any course of counseling or therapy or rehabilitation or treatment is recommended in any of the evaluation reports, Dr. Spiegel shall engage in such course as recommended. Further, Dr. Spiegel shall submit to the Board in advance of any petition for reinstatement, a plan of any intended practice of psychology and a plan for supervision of such practice. At the discretion of the Board, it may require Dr. Spiegel to pass an examination or engage in other remedial education as it deems necessary in order to be assured that he is competent and trustworthy to engage in the practice of psychology. All costs associated with any requirements imposed for reinstatement of licensure shall be borne by Dr. Spiegel.

3. Dr. Spiegel shall be assessed the costs to the State in this matter in the amount of \$13,653.29.

4. Dr. Spiegel shall be assessed a civil penalty in this matter in the amount of \$12,500 (\$2,500 for each of Counts I, III, IV, VI and VII).

5. The aforesaid costs and penalty shall be submitted to the Board by certified check or money order made payable to the State of New Jersey no later than the first day of the month following the entry date of the within Order. Dr. Spiegel may elect to pay the total of costs and penalty in equal monthly installments over a period of no more than three years commencing on the first day of the month following the entry date of the within Order. Each monthly installment shall be due and payable on the first business day of the month in the amount of \$726.48. Any failure to make a monthly payment on time shall cause the entire remaining balance to become immediately due and payable.

6. Dr. Spiegel shall make restitution to David Stetson by submitting to the Board of Psychological Examiners a certified check or money order made payable to David Stetson in the amount of \$2,500 within six months after the entry of the within Order.

7. The entire record in this matter shall continue to be sealed, excluding the Verified Complaint and its Supplement, the Answer, the Order of Temporary Suspension, Interim Orders of the ALJ, the Initial Decision, the Summary Decision, this Final Decision, and any subsequent decisions.

8. Respondent's request for a stay pending appeal is hereby denied for failure to demonstrate irreparable harm and because the public interest requires the immediate entry of the

within Order.

NEW JERSEY STATE BOARD OF PSYCHOLOGICAL EXAMINERS

By: _____

Kenneth G. Roy, Ed.D.

Kenneth G. Roy, Ed.D.
Chair

APPENDIX

Corrections to Initial Decision Issued September 15, 1997 and Order Granting Partial Summary Decision Issued December 16, 1996 by Diane C. Sukovich, A.L.J.

I. Initial Decision

Page 3, third paragraph, first word: Delete the number "Eight" and insert the number "Eleven."

Page 4, first paragraph, fourth line: Insert the word "pertinent" after "petitioner."

Page 19, second paragraph, fourth line: The name should be corrected to "Stanley Frumkin, D.D.S."

Page 22, first paragraph, third line: Change "file a projective" to "fire a projectile."

Page 25, first full paragraph, second line, parenthetical citation: Delete "Id." and insert "Tr., 11/13/95."

Page 32, fourth paragraph, fourth line: Delete "Spiegel" and insert "Frumkin."

Page 44, last paragraph, second line: Delete the word "suspension" and insert "revocation."

Page 46, second paragraph, third line: Delete the word "alcohol."

Page 50: Insert under "Witnesses: For Petitioner:" the following:

Detective Thomas Provenzano
Janeen Love
R. Michael Sanders, D.M.D.
Detective Supervisor Catherine C. Fenske
Susan Evans
Joseph J. Corrado

Page 50, Under "Witnesses" : Delete "For respondent:" and the two listed names.

Page 51, middle of the page: Insert "P-12(i) Corrected composite drug profile."

Page 53, R-1(b): Delete "1995" and insert "1985."

Page 53: R-1(c) should be R-5.
R-1(e) should be R-8.
R-1(g) should be R-9.